

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Part 101 of the Commission's)	WT Docket No. 07-54
Rules to Modify Antenna Requirements for the)	RM-11043
10.7 – 11.7 GHz Band)	
)	

REPLY COMMENTS OF LORAL SKYNET CORPORATION

Loral Skynet Corporation ("Skynet") respectfully submits the following reply comments in the above-captioned Notice of Proposed Rulemaking ("NPRM"). This proceeding seeks comment on whether modifications to the FCC's Part 101 Rules to allow use of smaller antennas by Fixed Service ("FS") operators in the 11 GHz band would be in the public interest given the potential for harmful interference with other users in the band, including Fixed Satellite Service ("FSS") operators.

At the outset, Skynet notes that this NPRM proceeding has been established with a rather narrow focus, namely, to consider permitting the installation of antennas as small as 0.61 meters by FS operators in the 11 GHz band to facilitate the efficient use of the band while appropriately protecting other users from interference. (NPRM at ¶ 17)

As expected, FS operators have registered their strong support for this proposed rule change, generally arguing that FS communications equipment has evolved since the current rule was

imposed to the point where much smaller antennas will not now materially increase the risk of interference to other operators in the band.

Understandably, the satellite operators filing comments in this proceeding have voiced concerns that such smaller antennas, and the proliferation of antennas that the rule change would promote, would cause increased interference to their operations in the absence of appropriate safeguards. (See the Comments of Mobile Satellite Ventures Subsidiary LLC (“MSV”) and Intelsat, Ltd. (“Intelsat”).)¹

In terms of appropriate safeguards, if the Commission decides to proceed with the proposed rule change to allow smaller FS antennas, MSV urges the Commission to also modify Section 101.104 of its rules to require operators of smaller microwave antennas to coordinate with existing FSS users of the band “as if the microwave operators were using a 1.22 meter antenna”. (MSV Comments at 3) Skynet agrees that the MSV proposal would go some way to addressing interference issues with individual antennas. Skynet also concurs with Intelsat that the Commission must also address two other interference issues, namely, increases in “aggregate interference” caused by the proliferation of these smaller antennas, and interference problems arising from “pointing error”. (Intelsat Comments at 4)

Intelsat has proposed a practical solution which effectively addresses all of these interference issues, while at the same time promoting more intensive and efficient use of the band by both FS

¹ As referenced in the Intelsat Comments (at 3-5), the Satellite Industry Association (“SIA”) raised similar interference concerns in the proceeding to consider the original FiberTower Corporation application to use smaller FS antennas in this band.

and FSS users. Specifically, Intelsat proposes that the 11 GHz band be segmented, with the “unplanned” portion of the band, at 10.95-11.2 GHz and 11.45-11.7 GHz, dedicated to FSS uses and the portion of the band, at 10.7-10.95 GHz and 11.2-11.45 GHz dedicated to FS applications. FSS use of these frequencies must be in accordance with the ITU Plan contained in Appendix 30B of the ITU Radio Regulations. Intelsat further proposes that, to avoid displacement and allow future growth, the limited number of FSS gateway earth stations that are currently in use, or would be used as feeder links for mobile satellite service (“MSS”) systems in future, be allowed to continue to operate in, and have access to, the Appendix 30B planned portion of the band, coordinating as they do today with FS stations. (Intelsat Comments at 7)

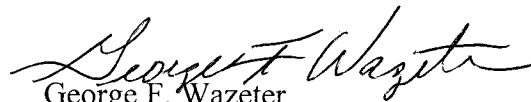
Skynet supports the Intelsat band segmentation proposal, including allowing FSS gateway earth stations that serve as feeder links for MSS systems to continue operating in the Appendix 30B planned portion of the band, subject to coordination with FS stations.

In Skynet’s view, the Intelsat proposal effectively meets the FS operators’ request for greater flexibility regarding the size of antennas they can generally use, while protecting the limited number of MSS gateway systems that will continue to operate in this portion of the 11 GHz band. The Commission’s defined objective in proposing the narrow rule change would therefore be fully satisfied. Over and above this, FSS operators and their user customers would benefit from this segmentation, as the “international-only” restrictions of footnote NG 104 to the Commission’s Table of Frequency Allocations currently imposed on all FSS use of the band could then be relaxed. Nor would there be any need to impose non-interference conditions on FSS services in the unplanned portion of the band as are currently in place with the few domestic

FSS services that have been permitted in the band on an individual case basis. Should the Commission adopt this proposal, FS and FSS operators would no longer have to coordinate with the other service within their respective 500 MHz portions of segmented spectrum in the 11 GHz band and so could maximize the use of their portion of the band with fewer restrictions. As Intelsat notes, this would improve spectrum efficiency and provide additional flexibility for both FS and FSS users in meeting user requirements. (Intelsat Comments at 1)

Implementation of the Intelsat proposal would represent a win/win situation for FS and FSS operators and their respective customers, and should therefore be given serious consideration by the Commission.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "George F. Wazeter".

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June 21, 2007